

**Remarks/Arguments:**

Claims 1, 8 and 12 have been amended. No new matter is introduced herein.  
Claims 1, 3 and 6-16 are pending.

Applicant acknowledges with thanks the courtesy shown to their representative by Examiner Oyeibisi and Supervisor Dixon during the Telephone Interview of May 8, 2008. During the course of the interview, Applicant's representative discussed support for Applicant's claimed feature of "selecting trading parameters so that at least one of the trading parameters is prevented from being included in optimized trading parameters." Supervisor Dixon suggested that page 8, lines 8-19 of the original specification provides support for "selecting only those optimal trading parameters." Applicant's representative also discussed differences between Kane (US 6,317,728) and Applicant's claim 1. Supervisor Dixon agreed that Col. 9, line 62-Col. 10, line 30 of Kane does not teach an optimization choice module that selects only the optimal trading parameters.

Claims 1 and 8 have been amended to clarify that the optimization choice module applies trading parameters and historical trading data to a regression model to select only the trading parameters that generate buy/sell trading signals that correspond to a price movement of securities. Basis for the amendment can be found, for example, at page 8, lines 1-21 of the original specification. Claim 12 has been amended to correct a typographical error. No new matter is introduced herein.

Claims 1, 3 and 6-16 have been rejected under 35 U. S. C. § 112, first paragraph, as failing to comply with the written description requirement. In particular, it is asserted that the subject specification does not provide support for the feature of "preventing" at least one of the respective trading parameters from being included in the optimized trading parameters. Claims 1 and 8 have been amended to clarify that the optimization choice module applies trading parameters and historical data to a regression model to select only the trading parameters that generate buy/sell trading signals that correspond to a price movement of securities. As acknowledged by the Examiner's Supervisor, page 8, lines 8-19 of the original specification provides support for the feature "selecting only those optimal trading parameters." Accordingly, Applicant respectfully requests that the rejection of claims 1, 3 and 6-16 under 35 U. S. C. § 112, first paragraph, be withdrawn.

Claims 1, 3 and 6-16 have been rejected under 35 U. S. C. § 103(a) as being unpatentable over Kane (US 6,317,728) in view of Freeny, Jr. (US 6,594,643). It is respectfully submitted, however, that these claims are patentable over the cited art for the reasons set forth below.

Claim 1, as amended, includes features which are neither disclosed nor suggested by the cited art, namely:

...an optimization choice module for generating optimized trading parameters, for each of the trading strategies, by applying a) the number of respective trading parameters and b) historical trading data including a price movement over time of the respective securities in the trading strategy to a regression model to select only the trading parameters that generate respective buy/sell trading signals over time that correspond to the price movement of the respective securities, the selected trading parameters forming the optimized trading parameters.... (*emphasis added*)

Claim 8 includes a similar recitation.

Kane discloses, in Fig. 1, a securities and commodities trading system that includes decision logic 14 composed of a plurality of agents 16. Agents 16 represent different buy and sell rules and the plurality of agents 16 collectively issue buy/sell suggestions for securities transactions. A buy long or a sell short decision is made by a voting algorithm that takes a vote of all decisions of all of agents 16. (Col. 5, lines 8 - 11 and lines 35 - 55). Each agent is assigned a different weight according to its success rate/failure rate and votes according to its assigned weight. (Col. 5, line 58 - Col. 6, line 4 and Col. 8, lines 35 - 49). Accordingly, Kane generates a decision using all of the agents 16.

As acknowledged by the Examiner on page 6 of the Office Action, Kane does not disclose or suggest (1) a trading strategy building module for building a number of independent strategies and generating independent respective buy/sell trading signals or (2) a multi-channel automatic execution platform for transferring respective self-optimized buy/sell trading signals for each of the trading strategies simultaneously through a number of parallel programming connection channels, as required by claim 1.

In addition, Kane does not disclose or suggest an optimization choice module that applies trading parameters and historical trading data, including a price movement over time of respective securities in the trading strategy, to a regression model to select only the trading

parameters that generate respective buy/sell trading signals over time that correspond to the price movement of securities, as required by claims 1 and 8. On page 5 of the Office Action, the Examiner asserts that Col. 9, line 62 - Col. 10, line 30 of Kane teaches an optimization choice module equivalent to Applicant's claimed optimization choice module. Applicant respectfully disagrees. Col. 9, line 62-Col. 10, line 30 of Kane does not teach an optimization choice module that selects only the trading parameters that generate buy/sell trading signals that correspond to the price movement, as required by claims 1 and 8. As acknowledged by the Examiner's Supervisor, Kane, at Col. 9, line 62-Col. 10, line 30, does not disclose or suggest an optimization choice module that selects only the optimal trading parameters. Instead, Kane teaches that a trading system monitors a portfolio of securities in real time to optimize profit or cut loss. Thus, Kane does not include all of the features of claims 1 or 8.

Freeny discloses, in Fig. 1, an automated investment trading system 10 including individual trading computer 16 that receives investment data from data sources 20 and predetermined trading criteria from input unit 14. (Col. 2, lines 47 - Col. 3, line 22). Trading computer 16 automatically analyzes the investment data from data source 20 using the predetermined trading criteria from input unit 14 and generates a trade request signal (Col. 3, lines 50 - 57). The trade request signal is provided to individual selected market trader 28 which executes at least a portion of the trade indicated in the trade request signal (Col. 3, lines 59 - 63 and Col. 4, lines 12 - 19). Freeny describes the predetermined trading criteria as including "instructions, such as buy and sell orders, or algorithms capable of being used to analyze investment data to generate a trade request to buy and/or sell" an investment item (Col. 3, lines 23 - 26) (emphasis added). Freeny also discloses that the market trader 28 may provide trading computer 16 with a trade confirmation signal. The trade confirmation signal may be used to modify the predetermined trading criteria in a predetermined manner by trading computer 16, based on the executed trade (Col. 4, lines 36 - 55).

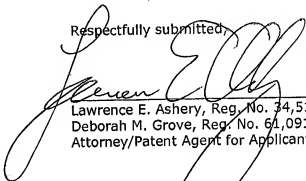
Freeny, Jr. does not disclose or suggest Applicant's claimed features of an optimization choice module that applies trading parameters and historical trading data to a regression model to select only the trading parameters that generate respective buy/sell trading signals over time that correspond to a price movement of securities, as required by claims 1 and 8. These features are neither disclosed nor suggested by Freeny, Jr. Thus, Freeny, Jr. does not make up for the deficiencies of Kane. Accordingly, allowance of claims 1 and 8 is respectfully requested.

Claims 3, 6, 7 and 9-16 include all of the features of respective claims 1 and 8 from which they depend. Accordingly, claims 3, 6, 7 and 9-16 are also patentable over the cited art.

In view of the amendments and arguments set forth above, the above-identified application is in condition for allowance which action is respectfully requested.

9/24/08  
Date

Respectfully submitted,

  
Lawrence E. Ashery, Reg. No. 34,515  
Deborah M. Grove, Reg. No. 61,091  
Attorney/Patent Agent for Applicant

LEA/DMG/dmg/ccr

☒ P.O. Box 980  
Valley Forge, PA 19482  
(610) 407-0700

285999v1